



U.S. ENVIRONMENTAL PROTECTION AGENCY

Contract No. 68-01-7367

002

EPA Region 5 Records Ctr.



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TECHNICAL  
ASSISTANCE  
TEAM



*Region V*

**ROY F. WESTON, INC.**

Spill Prevention & Emergency Response Division  
In Association with ICF Technology Inc., C.C. Johnson & Malhotra, P.C.,  
Resource Applications, Inc., Geo/Resource Consultants, Inc., and  
Environmental Toxicology International, Inc.



**WESTON**  
DESIGNERS CONSULTANTS



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TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION  
EPA CONTRACT 68-01-7367

Mr. Steven Faryan  
Deputy Project Officer  
Emergency Response Section  
Western Response Unit  
U.S. Environmental Protection Agency  
11th Floor  
230 South Dearborn Street  
Chicago, Illinois 60604

May 24, 1988

TAT-05-G2-00394

Re: International Harvester Site, Chicago, Illinois  
TDD #5-8704-07

Dear Mr. Faryan:

On May 19, 1987, the U.S. Environmental Protection Agency (U.S. EPA) tasked the Technical Assistance Team (TAT) to conduct a site assessment (SA) at the former International Harvester (IH) factory in Chicago, Cook County, Illinois. This site was reported to contain asbestos and polychlorinated byphenyls (PCB) transformers.

The TAT conducted an initial SA on May 19, 1987. No transformers, and only limited amounts of asbestos-like material were observed. Because of the high level of concern expressed by City of Chicago officials about the site, the TAT was additionally tasked by the U.S. EPA to sample for PCBs.

On August 21, 1987, during the second inspection, sampling was performed by the TAT. PCBs were detected in the samples, but at levels below the 50 parts per million (ppm) level promulgated by the Toxic Substances Control Act (TSCA) requiring specific management/disposal practices. An empty underground tank with an open valve was observed. Several other tank valves were observed but the tanks were inaccessible. Two closed, partially full drums were also observed on the site.

The conditions at the IH site do not warrant a removal action based on the criteria set forth in the National Contingency Plan. The TAT recommends that if a cleanup is conducted, air monitoring should be performed to ensure that asbestos fibers do not become airborne.

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

In Association with ICF Technology Inc., C.C. Johnson & Malhotra, P.C., Resource Applications, Inc.,  
Geo/Resource Consultants, Inc., and Environmental Toxicology International, Inc.



Mr. Steve J. Faryan

-2-

May 24, 1988

Should you have any questions or require additional information,  
please feel free to contact us.

Very truly yours,

ROY F. WESTON, INC.

A handwritten signature in cursive script, reading "Phyllis Radack".

Phyllis Radack  
Geologist

A handwritten signature in cursive script, reading "Scott D. Springer".

Scott D. Springer  
Leader, Region V  
Technical Assistance Team

PR/pm

**SITE ASSESSMENT**  
**FOR**  
**INTERNATIONAL HARVESTER**  
**CHICAGO, ILLINOIS**

**Prepared For:**  
**U.S. Environmental Protection Agency**  
**Region V**  
**230 South Dearborn Street**  
**Chicago, Illinois**

**CONTRACT NO. 68-01-7367**

**TAT-05-G2-00394**

**TDD NO. 5-8704-07**

**Prepared By:**  
**WESTON-SPER**  
**Technical Assistance Team**  
**Region V**

**May 1988**

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## 1.0 SITE DESCRIPTION

International Harvester's West Pullman Plant is located at 1015 W. 120th Street in the City of Chicago. The site consists of demolition debris of the physical plant, and covers approximately 21 acres (Figure 1). The land is presently owned by the Christ Universal Church, through its associated organization, the Better Living Foundation. Reverend Johnnie Coleman presides over both the church and the foundation.

The site is located in an industrial area of the city and is surrounded by operating and abandoned factories (Figure 2). An elementary school and play yard border the site on the southwest corner. The former Dutch Boy Paint Factory, which underwent an Illinois Environmental Protection Agency (IEPA) funded cleanup, lies directly to the east.

The terrain is essentially flat, and no streams were observed to cross the site. The Calumet River is approximately one mile south of the site.

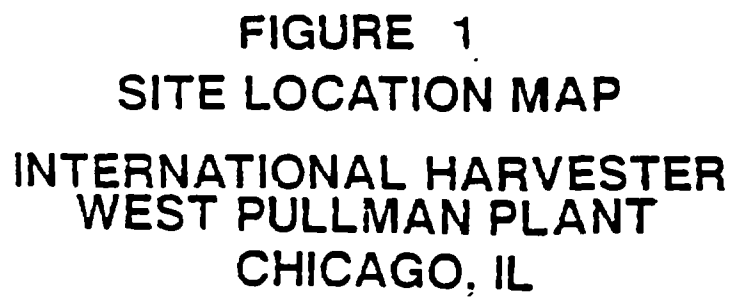
## 2.0 SITE BACKGROUND

International Harvester (IH) manufactured carburetors, milk coolers, bearings, chains and magnetos at the site for at least 50 years until July 7, 1983, when the property was transferred to the West Pullman Associates, a trust. The property was then deeded to the Better Living Foundation on July 21, 1987. The Better Living Foundation intended to construct low income housing on the site.

In April 1984, the Illinois Environmental Protection Agency (IEPA) began corresponding with IH officials about hazardous waste which allegedly was stored on-site. IH indicated that the only hazardous waste ever stored at the site was sulfuric acid used for pickling, and that the sulfuric acid had been removed in 1983, when the plant was closed. In 1984, IEPA officials decertified IH from storage of hazardous waste.

In June and July of 1985, IEPA visited the site to perform a Resource Conservation and Recovery Act (RCRA) inspection; however, because the site buildings were demolished, the inspection was canceled. The IEPA notified the City of Chicago of the status, and city officials subsequently issued a violation notice to the Better Living Foundation for failing to obtain the proper demolition permits. By November 1986, City of Chicago officials had solicited bids for a complete removal of all debris on-site, including asbestos. The lowest bid received was \$526,000. In December 1986, the City commissioned a real estate appraisal which determined the property had a commercial value of \$271,000 - \$362,000.

On December 17, 1986, the City of Chicago Asbestos Coordinator, Howard Schechter, entered the site and collected two samples



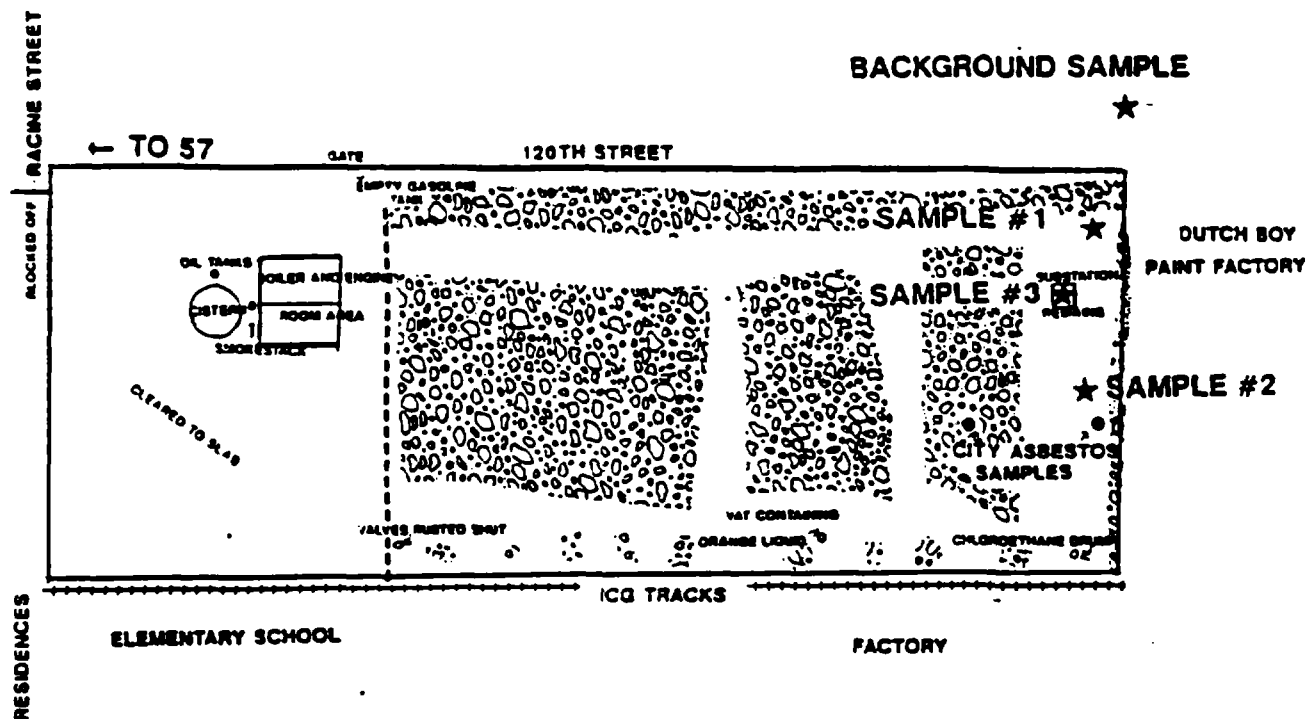
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TDD \*  
5-8704-07






1" = 275'

## FIGURE 2

### SITE SKETCH

INTERNATIONAL HARVESTER  
WEST PULLMAN PLANT  
CHICAGO, IL

SAMPLE LOCATIONS INDICATED

ROY F. WESTON, INC.		
		
DRAWN	DATE	PCS
PMR	9/4/87	1085
APPROVED		TDD #
<i>APM</i>	3/2/88	5-8704-07

which were sent to Micro-Fibre Laboratories, Inc. in Northbrook, Illinois for asbestos analysis. Both samples were found to contain 30 to 50 percent asbestos. Several samples collected at IH by the IEPA during the Dutch Boy cleanup also tested positive for asbestos.

In February 1987, Mark Limanni, of the City Corporation Counsel, consulted with John Connell of the U.S. EPA Toxic Substances Control Act (TSCA) Section about the potential hazardous nature of the site. Mr. Connell referred the site to the Emergency Response Section due to the suspected presence of transformers containing polychlorinated biphenyls (PCBs).

### 3.0 SITE INSPECTION

On May 19, 1987, Technical Assistance Team (TAT) Members Curt Michols and Phyllis Radack accompanied U.S. EPA On-Scene Coordinator (OSC) Len Zintak to the site. The site appeared to be covered with building debris (Attachment A - Photographs). A fence partially surrounded the site, but large gaps existed in the fence. No fence exists between the site and the school, or along the eastern border. Piles of household garbage and abandoned vehicles were observed on site. Entry was made via an open gate in the northern fence line along 120th Street. The debris piles ranged in height from ground level to approximately 15 feet. The piles were composed of a heterogeneous mixture of building debris and appeared to be unstable. The southwest portion of the site, closest to the school, had been cleared of debris. The only remaining structures observed on-site were portions of several walls and a smokestack. The TAT observed several empty 55-gallon drums, and one partially filled 55-gallon drum labeled "chloroethane".

Underground tanks were not evident, although an extensive storm sewer system existed. Some of the chambers were greater than 20 feet deep and contained varying amounts of water. The drains appeared to be clogged, as most of the entrances to the system lacked manhole covers and debris was observed in the chambers.

Water from a recent rain was observed ponded in depression areas on the ground, and in concrete containment structures. Fire department sketches indicated that the containment structures may have been associated with an underground storage tank system. The pH of ponded and standing water in the sewer system, was observed to be 6 as tested with pH paper. The TAT also determined the pH of a white, powdery substance to be 9.

On August 21, 1987, TAT members Elise Allen, Phyllis Radack and Mike Salem, and OSC Len Zintak re-entered the site to conduct a second assessment, and collect soil samples. Several underground tanks were located using fire department diagrams of the buildings and grounds. A gasoline tank near the gate at the north central fence was observed to be empty. Four valves which could possibly provide access to underground tanks were observed

near the southern border of the site. The valves were rusted, and no attempt was made to open them. The fire department diagram indicated that in 1944 the tanks contained mineral oil, quenching oil, and cutting oil. The TAT collected three soil samples on-site, concentrating on areas where transformers had been historically located as indicated by the fire department diagram. One background sample was collected off-site.

An open concrete containment structure which had been empty during the first visit was observed to be half-filled during the second inspection with an orange-red liquid. pH testing indicated a level of 3. The chamber may have been filled with rainwater contaminated by vestiges of an acidic substance which was already in the chamber.

#### 4.0 ANALYTICAL RESULTS

The samples collected during the site assessment were analyzed for PCBs by Gulf Coast Labs under TAT Analytical Service TDD # 5-8708-L1. The highest level detected was 18 parts per million (ppm) PCBs. Regulations published under TSCA set forth specific management/disposal requirements for material having PCB concentrations greater than 50 ppm.

#### 5.0 THREATS TO HUMAN HEALTH AND THE ENVIRONMENT

A potential threat to human health and the environment does not through inhalation of airborne asbestos. But the conditions at the IH site do not warrant a removal action based on the criteria set forth in the National Contingency Plan (NCP). The asbestos on the IH site is concentrated on the eastern side of the property, and the closest residence is in the far southwest corner. Most of the material suspected to be asbestos is buried or partially buried underneath demolition rubble. The likelihood that nearby populations would be affected is very low.

#### 6.0 RECOMMENDATIONS

Based on the TAT's inspection, historical information, and current conditions at the IH site, the TAT recommends that no removal action be conducted by the U.S. EPA. Because of the amount of demolition debris on-site, it is possible that additional asbestos and reported transformers could be buried underneath the debris. The TAT recommends that any activity at the site be conducted in such a manner to minimize generation of airborne asbestos.

**ATTACHMENT A**

**PHOTOGRAPHS**

Sample location #1

International Harvester

West Pullman Plant

Chicago, IL

8/21/87

Time: 1532

Photographer: Elise Allen *EL*

Witness: Phyllis Radack

Witness: Mike Salem



Sample location #2

International Harvester

West Pullman Plant

Chicago, IL

8/21/87

Time: 1538

Photographer: Elise Allen *EL*

Witness: Phyllis Radack

Witness: Mike Salem



Sample location #3

International Harvester

West Pullman Plant

Chicago, IL

8/21/87

Time: 1552

Photographer: Elise Allen *EL*

Witness: Phyllis Radack

Witness: Mike Salem





Empty underground tanks adjacent  
to boiler room and smokestack  
which may have contained oil

International Harvester  
West Pullman Plant

Chicago, IL

8/21/87 Time 1606

Photographer: Elise Allen *EL*

Witness: Phyllis Radack

Witness: Mike Salem



Inside tank which may have  
contained oil

International Harvester  
West Pullman Plant

Chicago, IL

8/21/87 Time: 1605

Photographer: Elise Allen *EL*

Witness: Phyllis Radack

Witness: Mike Salem



Vat containing orange liquid with  
low pH

International Harvester  
West Pullman Plant

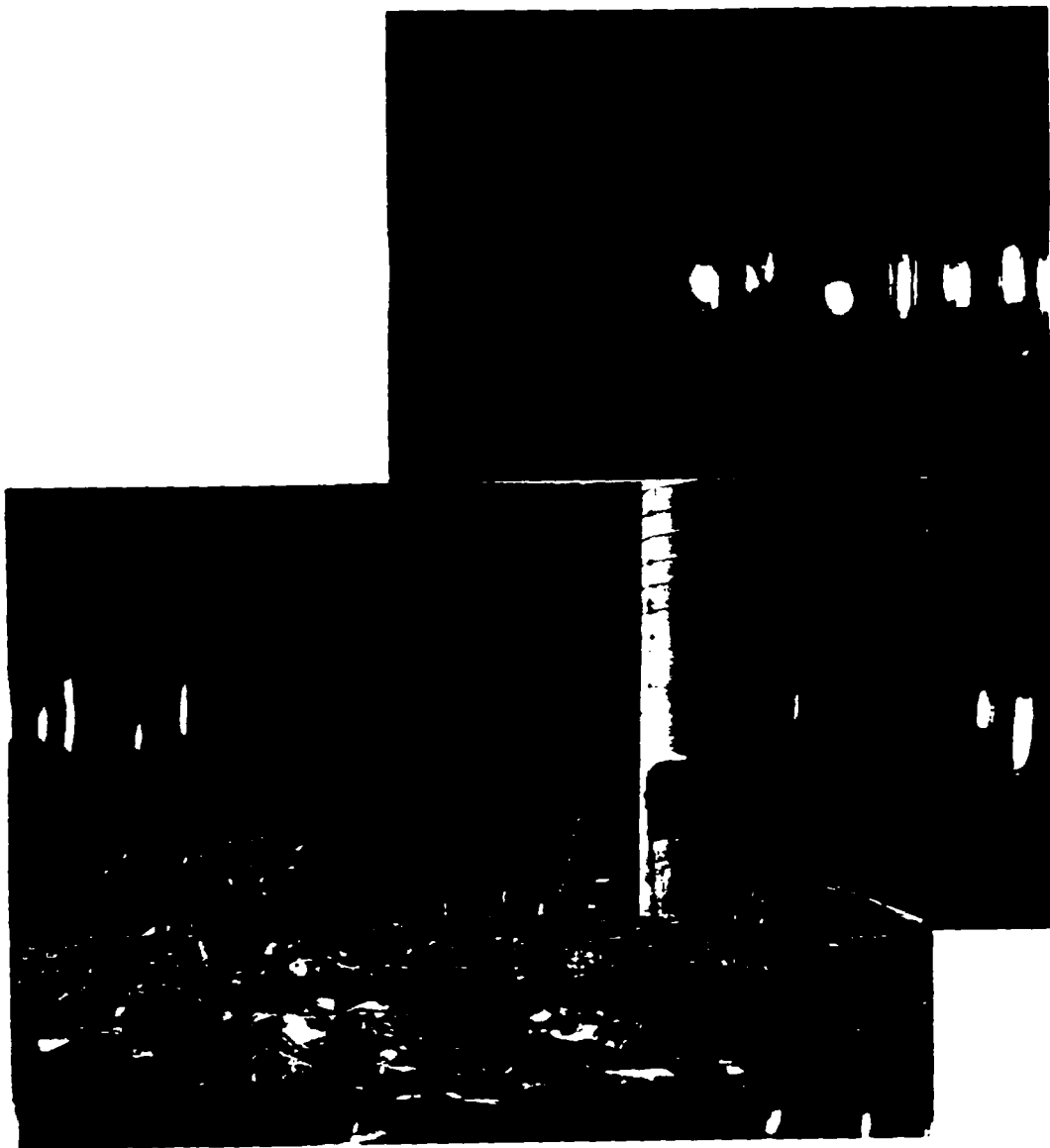
Chicago, IL

8/21/87 Time: 1247

Photographer: Elise Allen *EL*

Witness: Phyllis Radack

Witness: Mike Salem

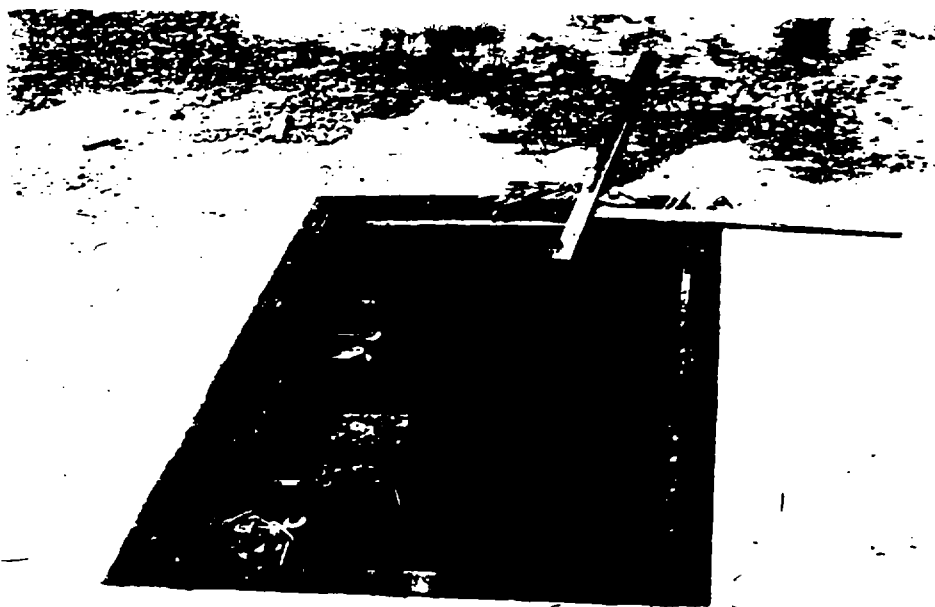


Smokestack, the only intact structure on site. Parts of walls  
also visible.

International Harvester West Pullman Plant

Chicago, IL 5/19/87 Time: 1115

Photographer: Phyllis M. Radack *R* Witness: Len Zintak



Open sewer chamber (?), partially water-filled.  
 International Harvester West Pullman Plant  
 Chicago, IL 5/19/87 Time: 1140  
 Photographer: Phyllis M. Radack Witness: Len Zintak



Open manhole showing clogged drain.  
 International Harvester West Pullman Plant  
 Chicago, IL 5/19/87 Time: 1125  
 Photographer: Phyllis M. Radack Witness: Len Zintak





Debris pile exhibiting heterogeneous nature of piles.  
International Harvester West Pullman Plant  
Chicago, IL 5/19/87 Time: 1100  
Photographer: Phyllis M. Radack Witness: Len Zintak



Drum labeled "chloroethane", partially full, closed bung.

International Harvester West Pullman Plant

Chicago, IL

5/19/87

Time: 1120

Photographer: Phyllis M. Radack

Witness: Len Zintak

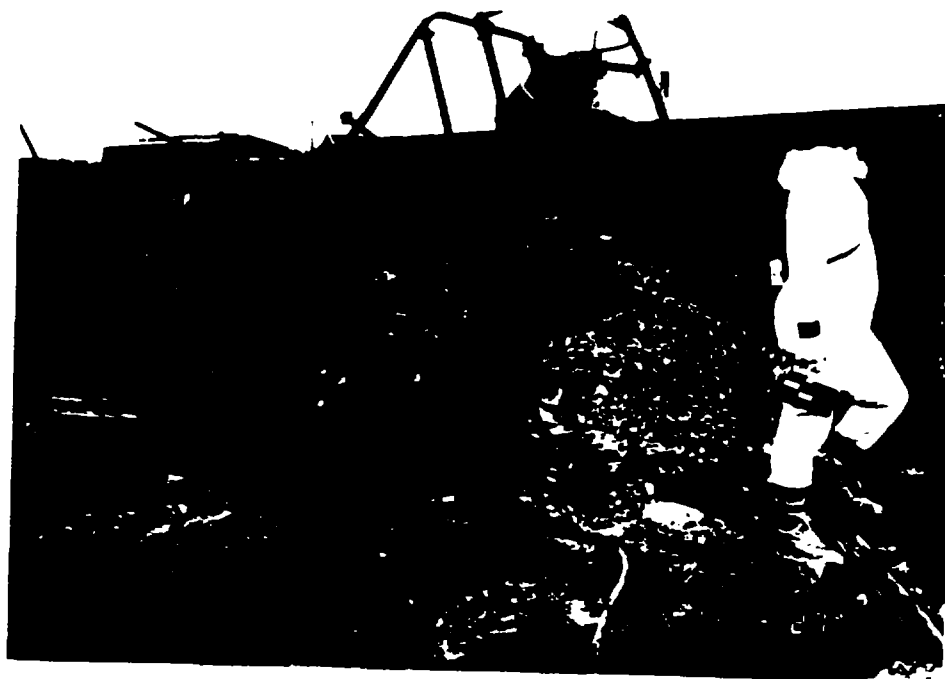
Pipes which possibly lead  
to underground tanks

International Harvester  
West Pullman Plant  
Chicago, IL  
8/21/87 Time: 1247  
Photographer: Elise Allen  
Witness: Phyllis Radack  
Witness: Mike Salem



Remains of electrical  
substation

International Harvester  
West Pullman Plant  
Chicago, IL  
8/21/87 Time: 1227  
Photographer: Elise Allen  
Witness: Phyllis Radack  
Witness: Mike Salem





Three examples of  
suspected asbestos

International Harvester  
West Pullman Plant  
Chicago, IL  
8/21/87

Photographer: Elise Allen  
Witness: Phyllis Radack  
Witness: Mike Salem